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Robert W. Quinn, Jr.

Director - Federal Government Affairs

Suite 1000 1120 20th St., NW Washington, DC 20036 202 457-3851 FAX 202 457-2545

### RECEIVED

OCT 24 1997

October 24, 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, NW, Room 222 Washington, D.C. 20554

RE: Ex Parte Meeting

CC DKT. 97-208 Application by BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc. for Provisioning of In-Region, InterLata Service in South Carolina.

Dear Mr. Caton:

On Thursday October 23, 1997, Kenneth P. McNeely, Stephen C. Garavito, G. Wayne Ellison and I of AT&T and Mark Haddad of Sidley & Austin met with Michael Pryor, Jordan Goldstein, Melissa Newman, Steven Teplitz and Jeannie Su of the Common Carrier Bureau's Policy and Program Planning Division and Thomas Power and Anu Searu of the Common Carrier Bureau's Competitive Pricing Division. The purpose of this meeting was to discuss an overview of issues raised in AT&T's Comments in the above referenced proceeding and specific issues related to the availability of Section 271 (c) (1) (B) entry and pricing issues raised in those Comments.

Attached are the three documents used during the presentation:

- 1. A brief outline of the presentation submitted during the meeting of AT&T;
- 2. The BellSouth South Carolina SGAT Price List, which was used for illustrative purposes and is already a part of the record as Attachment A to the Affidavit of Alphonso J. Varner on behalf of BellSouth; and

No. of Copies rac'd 01-2 List ABCDS



3. A four-page exhibit that was attached as an Exhibit (RSC-3) to the testimony of BellSouth witness Robert C. Scheye in the AT&T/BellSouth Arbitration proceeding, SCPSC Docket No. 96-358-C, which discusses the source of prices proposed by BellSouth during the AT&T/BellSouth arbitration for unbundled elements. This four-page exhibit, which was referenced but inadvertently omitted from Mr. Wood's affidavit, is provided as a written ex-parte submission pursuant to the Revised Procedure for Bell Operating Company Applications Under Section 271 of the Communications Act, FCC 97-330, dated September 19, 1997.

Additionally, as requested by the Common Carrier Bureau, Policy and Program Planning Division Staff, I have also provided the Order of the South Carolina Public Service Commission, Docket no. 96-358-C, Order No. 97-712, dated August 19, 1997, creating the permanent pricing docket for unbundled elements in South Carolina.

Two copies of this Notice are being submitted on the following business day to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

#### Attachments

cc:

J. Glodstein

T. Power

M. Pryor

A. Searu

J. Su

S. Teplitz

UNBUNDLED ELEMENT  bundled Loops  2-Wire Analog Voice Grade Loop, Per Month  Nonrecumng - First/edditional	BST TELRIC Filed	Proposed Price - Existing Terriff	Tariff Rate	Proposed	Ddca	_
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2-Wire Analog Voice Grade Loop, Per Month Nonrecurning - First/additional			Source	- True-U		Rate Sour
2-Wire Analog Voice Grade Loop, Per Month Nonrecurning - First/additional						
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	\$30.38	\$25.00	£7 5.3			ACSI neg ra
		\$140.00 / \$45.00*			151 20	<del></del> -
4-Wire Analog Voice Grade Loop, Per Month	\$49.42	\$45.00	E7.5.3		128.80	
Nonrecuring - First/additional		\$140.00 / \$45.00*			151 20	
2-Wire ISDN Digital Grade Loop, Per Month	\$47.34				128 80	<del></del> -
Nonrecurring - First/additional					\$1.20	
2-Wire ADSL/HDSL Loop, Per Month					\$18.00	<del>-</del>
Nonrecurring - First/additional					151 20	<u> </u>
4-wire HDSL Loop, Per Month					28.80	
Nonrecurring - First/additional					151.20	•
4-Wire DS1 Digital Grade Loop, Per Month	\$83.19	\$124.00	E7.5.6			
Nonrecuring - First/additional	·	\$675.00 / \$310.00	•			
•						
bundled Exchange Access IOC - Voice Grade						
0 - 8 Miles, Fixed Per Month	\$17.45	\$50.00	E7.5.3			
Per Mile, Per Month	\$0.0248	\$2.05	•			
9 - 25 Miles, Fixed Per Month	\$17.66	\$50.00	•			
Per Mile, Per Month	\$0.0270	\$2.00	•			
Over 25 Miles, Fixed Per Month	\$17.65	\$50.00	•	,,		
Per Mile, Per Month	\$0.0270	\$1.95	•			
Nonrecurring		\$100.00	•			
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bundled Local Switching**	<del></del>					
Inbundled Exchange Ports						
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Nonrecurring - First/additional						Cost estate
4-wire ISDN DS1, Per Month	\$262.26				220.00	TELRIC
Nonrecurring - First/additional				\$230,007 \$	200.00	Cost estima
2-Wire ISDN Digital, Per Month	\$11.83				\$14.50	TELRIC
Nonrecurring - Firet/additional				\$150,00/\$	120.00	Cost estime
2-Wire Analog Hunting - per line - Per Month	\$0.30				\$0.30	TELRIC
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Tandem Switching Per MOU		\$0.00074	E6.8.1 D.		
Common Transport Per Mile/MOU		\$0,00004	E6 8.1 C.		
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Intermediary Tandem Per MOU™				\$.002	Agreemen
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edicated Transport - DS1 only Per Mile, Per Month	<del> </del>			<del></del>	
		\$23.00	E6.8.1.B.	<del></del>	
Facility Termination, Per Month		\$90.00			
Facility Termination, NRC		\$100.49		<del></del>	
Other dedicated transport levels		<del></del>			
hannelization System - For Unbundled Loops	A				
Unbundled Loop System (DS1to VG) per sys/per mo.	\$415,37				ACSI neg. ra
Nonrecurring -				\$525.00	
Central Office Interface Per Circuit, Per Month	\$1.26	<del></del>		\$1.15	
Nonrecurring		<del></del>		\$8.00	
CS7 Signaling Transport Service					
Signaling Connection Link, Per Month		\$155,00	FCC 1, Sec.6	<del></del>	
Nonrecumng			FCC 1, Sec. 6		
Signating Termination (Port), Per Month			FCC 1, Sec.6	· · · · · · · · · · · · · · · · · · ·	<del></del>
Signaling Usage, Per 56 Kbps Facility, Per Month				\$395.00	Cost Estatus
00 Access Ten Digit Screening Service					
Per 800 Call Utilizing 800 Acc. Ten Digit Screening		<del></del>			
Svc. w/800 Númber Delivery, per query	\$0.0010	3.004	E6.8.4		
Per 800 Call Utilizing 800 Acc. Ten Digit Screening		<del></del>	<del></del>		
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Features, per query	\$0.0011	\$.0045	E6.8.4		
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Svc. wPOTS Number Delivery, per query	\$0.0010	\$.004	E6.8.4		
Per 800 Call Utilizing 800 Acc. Ten Digit Screening					
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Reservation Charge per 800 Number reserved		\$26.50 1st / \$.50 add1	£13.3	_	<del></del> .
Est Charge per 800 number est, w/800					
Number Delivery .		\$60.00 1st / \$1,50 add1	£13.3		
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Nunber Delivery		\$60,00 1st / \$1,50 edd1	£13.3		
Customized Area of Service Per 800 Number		\$3.00 1st / \$1.50 add1	E13.3		
Multiple interLATA Carrier Routing per cerrier					
requested, per 800 number		\$3.50 1st / \$2.00 addi	E13.3.		
Change Change per request		\$40.50 1st / \$.50 add1	£13.3		
Call handling and Destination Features per		\$3.00	E13.3		
800 number					
Ine Information Database Access Service	<del> </del>			<u>'</u>	
Common Transport, Per Query, per month	\$0,00006	\$.00030	FCC 1, Sec. 19.		
Validation, Per Query, per month	90.0094	\$.03800	•		
Nonrecurring - Establishment or Change		\$91.00	-		
See Exhibit RCS-6.					

SOUTH CAROLINA - BELLSO	OUTH TELRIC	AND PROPOSED	PRICES		
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perator Call Processing Access Service		···		<del></del>	
Operator Provided, Per Minute					
Using BST UDB	\$1,3429				35 TELRIC
Using Foreign LID8	\$1,3644			\$1.	36 TELRIC
Fully Automated, Per Attempt				·	
Using BST LIDB	30 0771			\$0.	.08 TELRIC
Using Foreign LID8	\$0.0963				10 TELRIC
rerard Operator Services Access Service					
Verification, Per Call	\$0 9042		E18.1		
Emergency Interrupt, Per Call	3,9612	\$1.95	E16.1		
irectory Assistance Access Service Calls					
Per Call	\$0.2889	\$.25	£9 5.3	<del></del>	
irectory Assistance Database Service					
Use Fee, Per DADS Cust's EU Request/Listing	\$0.0193	\$.005	A38 1,3		
Monthly Recumng	\$121.06	\$150.00	A38.1.3	· <u> </u>	<del></del>
irect Access to Directory Assistance Service (DAD					
Database Service Charge, Per Month	\$7,254,46		FCC 1, Sec 9		
Database Query Charge, Per Query	\$0,0052		FCC 1, Sec.9		
Nonrecurring - DADAS Service Establishement		\$1,000.00	FCC 1, Sec.9	)	<del></del>
ACC Access Service					
Per Call Attempt	\$0.0201		<del></del>		.25 Cost Estima
iumber Services Intercept Access Service					
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3,000,000		CAROLING TOTAL			
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Space Preparation Fee - Nonrecurring					B ICI Agreemer
Space Construction Fee - Nonrecurring				\$4500.	00 Cost Ext.
Cable Installation - Per Entrance Cable - Nonrecurring	<del></del>			\$2750.	00 VEIS rate**
Floor Space Zone A, Per Square Foot, Per Month				\$7 :	50 ICI Agreemen
Floor Space Zone B. Per Square Foot, Per Month				\$6.	75 ICI Agreemen
Power Per AMP, Per Month.					00 ICI Agreemen
Cable Support Structure, Per Entrance Cable					35 ICt Apreemen
POT Bay (Optional Point of Termination Bay)	<del></del>				
Per 2-Wire Cross - Connect, Per Month	\$.06	<del></del>		\$.4	40 TELRIC
Per 4-Wire Cross - Connect, Per Month	3,14				20 ICI Agreemen
Per DS1 Cross - Connect, Per Month					20 ICI Apreemen
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Cross-Connects					
2-Wire Analog, Per Month	\$.31	<del></del>		3:	30 ACSI neg. ret
4-Wire Analog, Per Month	3.61				50 ACSI neg. ret
Nonrecurring 2-wire and 4-wire					00 ACSI neg. res
DS1, Per Month		<del></del>			00 ICI Agreemen
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Premium - additional - Nonrecurring					00 ICI Agreemen
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#### BEFORE

#### THE PUBLIC SERVICE COMMISSION OF

#### SOUTH CAROLINA

DOCKET NO. 96-358-C - ORDER NO. 97-712

AUGUST 19, 1997

IN RE: Petition of AT&T Communications of the ) ORDER
Southern States, Inc. for Arbitration ) GRANTING
with BellSouth Telecommunications, Inc. ) MOTION FOR
) CREATION OF
) A DOCKET

This matter comes before the Public Service Commission of South Carolina (the Commission) pursuant to the Motion by AT&T Communications of the Southern States, Inc. (AT&T) for the establishment of a Generic Docket on Unbundled Network Element (UNE) costs, and to establish a hearing schedule which permits consideration of all parties interests and views and allows for adequate preparation time, including time for discovery, so that a complete record can be generated.

In support of its Motion, AT&T notes several factors.

Pursuant to Order No. 97-189, issued in the present Docket, the

Commission set certain interim prices for the UNEs, including

prices for called transport and termination and certain support

elements relating to network interconnection. The Commission has

required BellSouth Telecommunications, Inc. (BellSouth) to furnish

verifiable cost studies for UNEs and that a true-up process be

conducted to ascertain the actual cost of elements, on the basis

of which permanent cost-based prices can be established.

It appears to this Commission that the Motion of AT&T has merit. AT&T states that in lieu of a cost proceeding under the present Docket, that the Commission should institute a Generic Cost Studies Docket to determine permanent cost based UNE rates to be offered by BellSouth to AT&T and all other carriers interconnecting with BellSouth. According to AT&T, such a Generic Proceeding would preserve the rights of parties subject to an arbitrated agreement, like AT&T and BellSouth, and protect the due process rights of other carriers, the Consumer Advocate for the State of South Carolina (the Consumer Advocate) and other potential Intervenors affected by the level of BellSouth's UNE rates. Also, AT&T claims that a Generic Docket would be advantageous to the Commission in resolving the question of BellSouth's UNE costs in a single proceeding.

The Commission has examined this matter, and hereby grants the Motion of AT&T for establishment of a Generic Docket in this matter, based on the reasoning stated above. We shall consider the hearing schedule at a later time.

DOCKET NO. 96-358-C - ORDER NO. 97-712 AUGUST 19, 1997 PAGE 3

This Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:

Chairman

ATTEST:

Executive Director

(SEAL)

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	4-Wire Analog Creek Connect	3	0.50		
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	OS3 Cross Connect	3	72.48	\$ 155.00	· First
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	Overtime - 1st half hour			\$ 48.00	
	Frantien - 1st half hour			\$ 54.00	
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	Cents - additional	<del>-  </del>		\$ 25.00	
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	- 2 Wire HOSL *	13	18.00		51.20	L
	- 4 Wire HOSL *	13	28.80	\$	51.20	
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	Central Office Per Circuit, per month	ti	1.15		8.00	
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	· Over 25 miles, fined *	11	50,00			
	- Over 25 miles, per mile per month "	13	1.96		I	
	Name applies			3	100.00	
	Codesiod Transport - 061 level, For Mile, per month	11	23.30			
	- Facilities Termination, per month	18	90.66	\$	100.40	
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Applies only to 2 V	annium is accordant with the PTP name when Continue &t &t 1877.	<u>.</u>	1014	distant in	magart re	نہ ہور جن
Applies only to 2 V These rates were d	eveloped in constitutes with the PCC proxy rates, Section \$1.513(G) to great equivalency) divided by $0.000$ (proxing usage) and $0.01$ (exit of the $0.000$ ), i.e. $0.000$ , i.e. $0.000$ , $0.000$ ( $0.000$ ), i.e. $0.000$ , i.e. $0.000$	9	Informe DE1 de	Tested V	negeri re	to per mil orminatio

		$oldsymbol{\mathbb{T}}$	PROPOSI		
CHECK LIST			MONTHLY		
ITEM NUMBER	RATE ELEMENT	_]_	RECURBING	HOMPECURRING	
6. Unbundled Local	Unbundled Local Switching 1	T			
Switching	End Office Switching usage, per mou (1)	8	0.003		
	Unbundled Ports			· ·	
	- 2 Wire Analog Port, per line	13	2.70	\$ 50.00	· First
				\$ 18.00	· Addi
	- 4 Wire Analog Part, per line	18	4.00	\$ 50.00	· First
				8 18.00	· Addi
	- 2 Wire ISDN Digital Port, per line	18	14.50	\$ 150.00	· First
				\$ 120.00	· Addi
	- 4 Wire ISON DS1 Port, per line	18	320.00	\$ 230.00	· First
				\$ 200.00	· Addi
	- 2 Wire Analog Hunting, per tine	18	0.30	\$ 3.00	- First
		_		\$ 3.00	- Addi
		_			
7 (f) Access to 911	Access to 911 and 8911 Services	4			
and E911 services		↓_			
	<u> </u>	<del>[</del>			
7 (II) Access to DA	Olrectory Assistance Access Service	<b>ļ</b> .			
	DA Call Completion Access Service, per etempt "	1	0.25		
	Call Completion Access Termination Charge per completed cell*	3	0.08		
}	Number Services Intercept Access Service, per query *	1	0.30		
		<b>!</b> —			
} <del></del>	DA Access Service Call, per call "	13	0.25		
		<u> </u>			
<del></del>	Circulary Transport	ļ.			
<del></del>	- Sw. Local Channel - 081 Level, per LC, per mentit *	3	133.81		· First
	- Sw. Dedicated Transport - OS1 lavel, Per Mile, per month	1	23,50	8 486.83	· Add1
<del></del>	- Sw. December 1 (America) - OS1 avec, Per man, per manen	<b>!</b>	\$90.00	\$ 100.49	<del></del>
	Feelites Termination, per manth     Suitabed Common Transport, per SA Ass. Svs. Call *	1	0.0000	100.49	
	Substant Common Transport, pay SA Aus. Size Call Mills 1	H	0.00084		
	Acres Ventus Cultura on M. Acres Co. Call	H	0.00045		<del></del>
	- Assess Tondom Britishing, per DA Ass. Svs. Call * - DA Interpennaging, per DA Ass. Svs. Call *	H	0.002	<del></del>	
	- Installation, truck side over, per truck or signaling	١		\$ 915,00	· First
<del></del>	connection *	-		\$ 100.00	
				100:00	
	CA Catabase Savige	_		<del></del>	
		1	0.656	<del></del>	
	Use Pas, pgr DADS existence's and user request *     Monthly recurring charge *	Ť	180.60	<del>-</del>	
		<u> </u>		<del></del>	
	Circle Access to CA Service			<del></del>	
	- SASA Service Concessioned Charge			\$ 1,000.00	
<del></del>	· D/GAS Delabore Spring Charge, aur march *	3	5,000.00		
		Ĭ	0.023		
· Raine are mained in	tree-up. However, the rate for any legal interestruction or unbended			d in control at a case	) Sudicat la
true-up before the C	environment in began of last spring ages metro action	<b>1</b>		nation of the term	of this
Statement.					
Note(s):		_	<del></del>		
	wal vertical features will be out by Circler of the Commission in a segur	4	otel. No dans	a will be assessed to	r the
activation and use o	I vertical features until that time. Rates established by the Commissio		these festeres w	he maded process	dively from
the date they are ed			T		

HIGH RURINER RATE ELEMENT RICHRING ROPER ROYAGE (DI) Access to Operator Services Operator Call Operator Call Operator Call Operator Call Operator Provided Call Hearding using BET LDB, per rets.  Operator Call Ope			I	PROPOSE	DRATES	
(III) Access to Coparater Services Coparater Cell Corposition evex. Coparater Prevented Cell Handling using BET LDE, par min.*  - Cell Companion Avex Cell Companion Access to Coparater Prevented Cell Handling using Intering. 15 1.17  - Fully Automated Cell Handling using Intering. 15 1.17  - Fully Automated Cell Handling using Intering. 15 1.17  - Fully Automated Cell Handling using Intering. 15 1.18  - Fully Automated Cell Handling using Intering. 15 1.18  - Fully Automated Cell Handling using Intering. 15 1.18  - Bury Line Verification Service, per cessarenes  - Emregosprey Intering Intering. 15 1.18  - Interiorist, per missage  - Interiorist, per missage - Call'S, per missage - Non-cessagea, per missage - Non-cessagea, per missagea - Non-cessagea - Non-cessagea - Non-cessagea - Non-cessagea - Non-cessagea - Non-ces	CHECK LIST					
Competion invos. — Operator Provisted Cell Honoline using BET LUDI, per min.* \$ 1.17  Competion invos. — Operator Provisted Cell Honoline using strategic LUDI, per min.* \$ 1.17  — Cell Competion Assess Territorials College per cell etternol? \$ 0.08  — Fully Assessable Cell Honoling using BET LUDI, per esternol? \$ 0.08  — Fully Assessable Cell Honoling using broage LUDIs, per esternol? \$ 0.18  — Busy Lune Verification Service, per celeprones  — Emergency Interrupt Extendits, per celeprones  — Emergency Interrupt Extendits, per celeprones  — Interviews, per message — Non-deast Paid Repeat System (REPPRS)*  — Interviews, per message — Non-deast Paid Repeat System (REPPRS)*  — Interviews, per message — Non-deast Dearwise, per message — Non-deast Dearwise, per message — Non-deast Usage File (DOUP)*  — Receiving Exervice (only applied to unburdled operator — services messages), per message — Non-deast Dearwise (only applied to unburdled operator — services messages), per message — Non-deast Service (only applied to unburdled operator — services messages), per message — Subscriber Listing Information — Obst Transmission, per message — Subscriber Listing Information — (1) No obsege for customers' primary — Service — Deat Transmission, per message — Subscriber Listing Information — (1) No obsege for customers' primary — Service — Torif.  Access to Table — Access to Numbers — Torif. — Access to Table — Access to Numbers — Torif. — Segeral Transfer Polis, per message — 3 184.00 \$ 510.00 — Cell Segeral Transfer Polis, per message — 3 184.00 \$ 510.00 — Cell Segeral Transfer Polis, per message — Cell Segeral Transfer Polis, per message — Cell Reving & — Cell Segeral Transfer Polis, per message — Cell Reving & — Cell Segeral Transfer Polis, per message — Cell Segeral Transfer Polis, per message — Cell Reving & — Cell Segeral Transfer Polis, per message — Cell Reving & — Cell Segeral Transfer Polis, per message — Cell Segeral Transfer Polis, per message — Cell Segeral Transfer Polis, per message — Cell Segeral Transfer Polis,	tem number	rate element		recurring	NOWINGUISM	<u>a                                      </u>
Compation avea.  Constitute Previolated Call Handling using BET LUBB, per mink.  Compation avea.  Constitute Previolated Call Handling using large BET LUBB, per mink.  Cold Compation Assess Yorkhandlin Chapter per not interrupt.  Cold Cold Previoling Services (not BET LUBB, per network.)  Cold Cold Previoling Services (not BET LUBB, per network.)  Cold Cold Previoling Services (not BET LUBB, per network.)  Cold Cold Previoling Services (not BET LUBB).  Cold Cold Previoling Services (not Between Cold Previoling Services Cold Previoling Services (not Between Cold Previoling Services (not Services per notes) Services Services (not Notes) Services (not Notes			$\mathbf{I}$			J
- Cal Completion Access Termination Chapte per cell titlengs* \$ 0.05   - Fully Automated Call Hereillen using SPT USD, per distrings* \$ 0.15   - Busy Line Verification Service, per deservences \$ 0.15   - Busy Line Verification Service, per deservences \$ 0.15   - Browgengy Velorings Service, per deservences \$ 0.16   - Emergency Velorings Service, per deservences \$ 0.16   - Emergency Velorings Service, per deservences \$ 0.16   - Introduction, per message \$ 0.05   - Introduction, per message \$ 0.05   - Non-Cont Paid Report System (ISSPRS)* - Introduction, per message \$ 0.06   - Non-Cont Paid Report System (ISSPRS)* - Introduction, per message \$ 0.06   - Non-Cont Paid Report System (ISSPRS)* - Non-Contractions, per message \$ 0.06   - Non-Contractions, per message \$ 0.06   - Non-Contractions, per message \$ 0.00   - Non-Contractions (Introduction of the Contraction of t	(III) Access to	Operator Services	$\mathbf{I}$			
- Cell Completion Access Termination Chapter per cell reterrory		Operator Provided Call Handling using 867 LIDB, per min.*		1.17		
- Cell Completion Access Termination Chapter per cell reterrory		- Operator Provided Call Handling using fereign LIDB, per min."	18	1.17		T
- Fully Automated Cell Handling using STLUED, per attempt?  - Fully Automated Cell Handling using sTLUED, per attempt?  - Busy Line Verification Bervior, per ecourrence  - Busy Line Verification Bervior, per ecourrence  - Enrosymoly Interrupt Service, per ecourrence  - Enrosymoly Interrupt Service, per ecourrence  - Enrosymoly Interrupt Service, per ecourrence  - Interrupt Service (Interrupt Service)  - Interrupt Service (Interrupt Service)  - Interrupt Service (Interrupt Service)  - CATS, per message  - CATS, per message - CATS		Call Compission Access Termination Charge per call attempt*	18	0.06		<del>                                     </del>
- Busy Line Verification Service, per consuments  - Emergency Interrupt Service, per consuments  - Emergency Interrupt Service, per consuments  Nec-Service Poid Report System (NSPRS)*  - Interestine, per missage  - CATS, per missage  - CATS, per missage  - Recommission, per missage  - Nec-ordinamissage, per missage  - Nec-ordinamissage, per missage  - Recommission (soly applied to unburnified operator  - Interestine Service (soly applied to unburnified operator  - Interestine Controlled operator  - Recoming Service (soly applied to unburnified operator  - Interestine Controlled operator  - Necessing Service (soly applied to unburnified operator  - Recomming Service (soly applied to unburnified operator  - Recomming Controlled operator  - Necessing Service (soly applied to unburnified operator  - Necessing Controlled operator  - Necessing Controlled operator  - Necessing Controlled operator  - Necessing Controlled operator  - Recommission (soly applied to unburnified operator  - Recommission (soly applied		<ul> <li>Fully Automated Call Handling using BET LIDE, per attempt?</li> </ul>	73	0.15		
- Busy Line Verification Service, per comments  - Emergency Interrupt Service, per comments  - Emergency Interrupt Service, per comments  - Ren-Sent Poid Report System (NSPRS)*  - Interrelation, per missage  - CATS, per missage  - CATS, per missage  - Ren-demander, per missage		<ul> <li>Fully Automated Call Handling using fereign LIDB, per attempt*</li> </ul>	18	0.15		
- Emergency Interrupt Service, per occurrence   \$ 1.66		Busy Line Verification Service, per ecourtence	18	0.90		
- Intrinsists, per message \$ 0.06   - CATS, per message \$ 0.16   - CATS, per message \$ 0.16   - Nen-consumbrate, per message \$ 0.16   - Nen-consumbrate, per message \$ 0.16   - Recenting Service (only applied to unbundled operator services messages), per message \$ 0.006   - Nessage Distribution, per message \$ 0.004   - Message Distribution, per message \$ 0.004   - Opto Transmission, per message \$ 0.001   - Opto Transmission of the message \$ 0.0002   - Opto Transmission of the message \$ 0.0002   - Opto Transmission of the message \$ 0.0002   - Opto Transmission of the message \$ 0.0000   - Opto Transmission of the message \$ 0.0000   - Opto Politic Calls State Internation of the message \$ 0.0000   - Opto Politic Calls State Internation of the message \$ 0.0000   - Opto Politic Calls State Internation of the message \$ 0.0000   - Opto Politic Calls State Internation of the message of		Ernergency Interrupt Service, per ecourrence	18	1.96		
- Introduce, per message \$ 0.06   - CATS, per message \$ 0.16   - CATS, per message \$ 0.16   - Non-contembrous, per message \$ 0.16   - OLLIC Daily Usage Pilo (COUP) * - Resenting Service (only against to unbundled operator services messages), per message \$ 0.008   - Nessage Distribution, per message \$ 0.004   - Message Distribution, per message \$ 0.004   - Outo Transmission, per message \$ 0.001    White Page Subscriber Listing Information (1) No charge for customers' primary fairing Outo Transmission, per message \$ 0.001    White Page Subscriber Listing Information (1) No charge for customers' primary fairing Outo Transmission, per message \$ 0.001    White Page Subscriber Listing Information (1) No charge for customers' primary fairing Outo Transmission (2) Additional listings and optional listings are provided at rails a set forth in SST's infrostes General Subscriber Service Transf Access to Tole- Access to Numbers No Charge    Nondiscriminatory Unbandled Signating *  Access to Tole- Access to Numbers   No Charge    Nondiscriminatory Unbandled Signating *  Access to Tole- Access to Numbers   No Charge    Nondiscriminatory Unbandled Signating *  Access to Tole- Access to Numbers   No Charge    Nondiscriminatory Unbandled Signating *  Access to Tole- Access to Numbers   No Charge    Provide Control Points   Point   Point   Point   Point    Access to Tole- Access to Numbers   No Charge    Access to Tole- Access to Numbers   No Charge    Access to Tole- Access to Numbers   No Charge    Access to Tole- Access to Numbers    Access t						
- Intrinsists, per message \$ 0.06   - CATS, per message \$ 0.16   - CATS, per message \$ 0.16   - Nen-consumbrate, per message \$ 0.16   - Nen-consumbrate, per message \$ 0.16   - Recenting Service (only applied to unbundled operator services messages), per message \$ 0.006   - Nessage Distribution, per message \$ 0.004   - Message Distribution, per message \$ 0.004   - Opto Transmission, per message \$ 0.001   - Opto Transmission of the message \$ 0.0002   - Opto Transmission of the message \$ 0.0002   - Opto Transmission of the message \$ 0.0002   - Opto Transmission of the message \$ 0.0000   - Opto Transmission of the message \$ 0.0000   - Opto Politic Calls State Internation of the message \$ 0.0000   - Opto Politic Calls State Internation of the message \$ 0.0000   - Opto Politic Calls State Internation of the message \$ 0.0000   - Opto Politic Calls State Internation of the message of		Hon-Sert Paid Report System (NSPRS) *				
CLEC Daily Usage Pile (CCUP) *  - Recenting Service (only applied to unbundled operator  - Recenting Service (only applied to unbundled operator  - Service message   \$ 0.006    - Message Distribution, per message   \$ 0.006    - Data Yrimermission, per message   \$ 0.001    - Data Yrimermission, per message   \$ 0.001    - White Page   \$ 0.001    - Message to Listing Information   (1) No charge for customers' primary    - Recent Information   (2) Administration factor in BST's introduced at other set forth in BST's introduced customers for message    - Access to Tele Primary   Unbundled Standing    - Access to Tele Primary    - Access to T		Intractate, per message	18	0.06		
CLEC Daily Usage Pile (COUP) *  - According Service (only applied to unbundled operator  - service message), per message  - Message Distribution, per message  - No.001  - Data Transmission, per message  - S. 0.001  - White Page  - Data Stransmission, per message  - S. 0.001  - White Page  - Data Stransmission, per message  - Country Listings  - Call Service (authorities Listing Information)  - Call Service (authorities and aptional listings and aptional listings are provided at rates set forth in BST's informations (authorities Centered Subscriber Service)  - Tariff.  - Access to Total- phase Numbers  - Nondiscriminatory  - Michanded Signafing *  - Access to Telephase (authorities (authorities Centered Subscriber Service)  - Tariff.  - Access to Total- phase (authorities (authorities Centered Subscriber Service)  - Tariff.  - Access to Total- phase (authorities (authorities Centered Subscriber Service)  - Tariff.  - Access to Total- phase (authorities (authorities Centered Subscriber Service)  - Tariff.  - Access to Total- phase (authorities (authorities (authorities Centered Subscriber Service)  - Tariff.  - Access to Total- phase (authorities Centered Subscriber Service)  - Tariff.  - Access to Total- phase (authorities (authoritie	والمراكسية بيكانس والخبيس والمساورة	- CATE, per message	18	0.06		
CUEC Daily Usage Pite (COUP) *  - Recenting Service (only applied to unburified operator  services messages), per message \$ 0.008    - Juleasage Distribution, per message \$ 0.000    - Data Trimmunissien, per message \$ 0.001    White Page \$ 0.		- Non-conterminate, per mossage	13	0.16		
- Recenting Services (only applied to unbunified operator  services messages), per message  1 - Message Distribution, per message  3 - 0.008  - Duta Transmission, per message  3 - 0.001  White Page Subscriber Listing Information  (1) No charge for customers' primary Solings  (2) Additional listings and optional listings are provided at ratios set forth in BST's Intrastas General Subscriber Service  Toril.  Access to Tele- Access to Tele- Primary  Nondiscriminatory  Unbunified Signafing *  Access to Tele- Primary  Ronal Transfer Pales, per mentils  1 - 144, per Bids, per mentils  Accessas to *  Call Relating & Signafing Connections (Links)  Decohases & *  A' Link, per Bids, per mentils  Accessas to Signafing Connections (Links)  Decohases & *  A' Link, per Bids, per mentils  Accessas to Signafing Connections (Links)  Call Relating & Signafing Connections (Links)  Signafine Control Pales, per mentils  Completion  Signafine Control Pales, per mentils  - Caster Market Control Pales						
- Recenting Services (only applied to unbunified operator  services messages), per message  1 - Message Distribution, per message  2 - Outs Transmission, per message  3 - 0.001  White Page Subscriber Listing Information  (1) No charge for customard primary integration (1) and provided at ratios and optional listings and optional listings and optional listings are provided at ratios and forth in BST's intreastes General Subscriber Service  Torif.  Access to Tele- Access to T		OLEC Daily Usage File (ODUF) *	Т			
Services messages), per message  - Nessage Distribution, per message  - Opto Transmission, per message  3 0.001  - Vinte Page Subscriber Listing Information  (1) No charge for customers' primary  - Information  - Information defense in the service of the service of the service of forth in SST's  - Information General Subscriber Service  - Turil.  - Access to Tele- phone Numbers  - Nondiscriminatory  - Unburided Signaling  - Access to CCST Signaling Connections (Linte)  - Optoberse & Signal Transfer Polis, per message  - Signal Transfer Polis, per message  - Signal Transfer Polis, per message  - Call Routing & Signal Transfer Polis, per message  - Completion - Signaling Linter, Polis, per message - Completion - Connection - Contraction -			Т			
- Message Distribution, par message \$ 0.004   - Osts Transmission, par message \$ 0.001   - Orectory Listings   -		services mesteres), her mestade	18	0.008		<del>                                     </del>
- Data Transmission, per message  3 0.001  White Page Subscriber Listing Information (1) No charge for customers' primary Settings.  (2) Additional Singles and optional listings and optional listings are provided at rates set forth in 851's Infraediate General Subscriber Service Tarill.  Access to Toto- phone Humbers  No Charge	<del></del>	- Message Distribution, per message	13			<del></del>
White Page Directory Listings  (2) Additional fishings and optional listings are provided at rates set forth in SST's intreases General Subscriber Service  Access to Tole- phone Numbers  No Charge		- Data Transmission, per message		0.001		<del></del>
Orrectory Listings  (2) Additional listings and optional listings and provided at ratios set forth in SST's Intrastate General Subscriber Service Torif.  Access to Total phone Numbers  Nondiscriminatory Unbunded Standing *  Access to CCS' Signaling Connections (Lints)  Cotatessee & "A" Lint, per first, per month \$ 186.00 \$ 510.00  Accessed Signal Transfer Polis, per month \$ 186.00 \$ 510.00  Accessed Signal Transfer Polis, per month \$ 186.00 \$ 510.00  Accessed Signal Transfer Polis, per month \$ 186.00 \$ 510.00  Cal Routing & Signal Transfer Polis, per month \$ 186.00 \$ 510.00  Cal Routing & Signal Transfer Polis, per month \$ 386.00  Signal Transfer Polis, per month \$ 386.00  Signal Transfer Polis, per month \$ 386.00  Signaling Listing, per get per month \$ 386.00  Signaling Listing, per get per month \$ 386.00  Signaling Listing, per getty, per month \$ 386.00  Signaling Control Poliss  LIST Visitation  - Consens Transget per getty, per month \$ 300.0005  - LIST Visitation  - Consens Transget per getty, per month \$ 300.0005  - LIST Visitation  - Consens Transget per getty, per month \$ 300.0005  - LIST Visitation  - Consens Transget per getty, per month \$ 300.0005  - LIST Visitation  - Consens Transget per getty, per month \$ 300.0005  - LIST Visitation  - Consens Transget per getty, per month \$ 300.0005  - LIST Visitation per getty per getty \$ 300.0005  - LIST Visitation per getty per getty \$ 300.0005  - Consens Transget per getty per getty per getty per month \$ 300.0005  - Consens Transget per getty per getty per month \$ 300.0005  - Consens Transget per getty per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per getty per month \$ 300.0005  - Consens Transget per get	**************************************		1			
Directory Listings  (2) Additional listings and optional listings and provided at rates set forth in SST's Intrastate General Subscriber Service Torif.  Access to Toto- phone Numbers  Nondiscriminatory Unburided Standing*  Access to  CCST Signaling Connections (Lints)  Catchesees &  Authority Files, per month  Signal Transfer Polis, per month  Completion  Signal Transfer Polis, per month  Signal Transfer Polis, per month  Signaling Usego, Per Si Rige Footly, per month (1)  Signaling Usego, Per Si Rige Footly, per month  - Common Transget per query  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Polis  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Polis  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Cost, Polis Code Signal-Internet or Change, per cetals  - Control Transfer Polis per gency  - Code Signal Transfer Polis per gency  - Code Signal Transfer Polis per gency  - Code	White Page	Subscriber Listing Information	(1)	Ne charge for c	ustomers' primary	t
Completion   Signal Transfer Point, per memb   Signaling & Signal Transfer Point, per memb   Signaling & Signal Transfer Point, per memb   Signaling & Signaling & Signaling & Signaling & Signal Transfer Point, per memb   Signaling Usege, Per Si Rige Feelby, per memb   Signaling Usege, Per Si Rige			_	Seines.		
Access to Total Access to Numbers  Access to Total Total Access to Numbers  Nondiscriminatory  Nondiscrimina			a	Additional listing	s and outland list	101
Access to Tele- Access to Tele- Printer  Access to Tele- Printer  Access to Tele- Printer  Access to Numbers  Access to Numbers  Access to Cell' Signaling *  Access to Cell' Signaling Connections (Links)  Catabases & "A" Link, per link, per menth \$ 194.00 \$ 510.00  Assected Signal **  This, per link, per menth \$ 194.00 \$ 510.00  Assected Signal **  Call Solution \$ 194.00 \$ 510.00  Call Soluting & Control Printer Point, per menth \$ 0.000000 Call Solution  Call Resulting & Signal Transfer Point, per pert per menth \$ 196.00  Signal Transfer Point, per pert per menth \$ 196.00  Signal Transfer Point, per pert per menth \$ 196.00  Signal Transfer Point, per pert per menth (1) \$ 196.00  Signal Transfer Point \$ 100.00  Signal Transfe						
Access to Total Access to Numbers			_	Intrastate Gene	rat Subscriber Sen	nae
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	Svc. w/600 Number Delivery, for 600 Humbers,					
	w/ Optional Complex Features, per message	3	0.0045			
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	- Reservation Charge per 800 Number reserved	4		8	28.50	
				3	0.50	- 4461
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Number Portabili	ly Interim Humber Pertubility					
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	- Business Line, per number parted "	13	1.50			
	- Residence Line, per number ported *	13	1.25			
	- Additional casualty for simultaneous call forwarding, per					
	j oddilongi gath "	13	0.50			
	- Rate per order, per and user location *			1	25.00	

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			PROPOSED RATES				
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	- Asoldense, per number period *		0.01	\$	1.00		
	- Rate per order, per end user lecation *			\$	25.00		
	- SPNP-DID Trunk Termination, per trunk *	8	13,00	8	164.00	- Initial	
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	- D&1 Dedicated Transport (1), (2)						
	- Per mão	- 13	23.80				
	Facilities Termination, per may	- 18	90.00	8	100.49		
2. Local Dieling	Local Dialing Parity	No	Charge				
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13. Reciprocal	See Checkflet Nem #1						
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	BST's Retail Services Rates		14.8%				
	to true-up. However, the rate for any total intercennection or units						
true-up before the	Commission orders rates trued-up shall be capped at the rate set	out in this price	list for the re	meinder of	the terri	of this	
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## BellSouth South Carolina 271 Application - CC Docket 97-208

October 23, 1997

AT&T Meeting
with the
Federal Communications Commission

### AT&T's Efforts to Enter South Carolina

- AT&T has sought to enter the South Carolina market using the three vehicles available under the Act.
  - Resale
  - Unbundled Network Elements
  - Facilities

2

### AT&T Entry Efforts - Timeline

- 2/29/96 AT&T certificated as a local provider.
- 3/4/96 Region-wide negotiations begin.
- 3/11/96 AT&T requests UNEs.
- 3/28/96 AT&T provides requirement document for purchase of UNE combinations.
- 6/12/96 AT&T makes request for interconnection.
- 6/20/96 AT&T requests ability to order 8 UNE combinations by November, 1996.

### AT&T Entry Efforts - Timeline

11/15/96 Petition for arbitration filed.

2/3-5/97 Arbitration hearings.

3/10/97 Arbitration order.

6/2/97 Interconnection Agreement signed.

6/20/97 SCPSC approves Interconnection

Agreement.

7/18/97 AT&T appeals SCPSC order approving Interconnection Agreement.

## BellSouth's Strategy Has Been to Limit CLECs To One Form of Entry

- BellSouth's strategy:
  - Restrict resale
  - Restrict UNEs
  - Limit competition to facilities build-out

5

## BellSouth Has Maintained Barriers to Entry in South Carolina

- Failure to offer all services for resale in compliance with the Act.
- Failure to provide cost-based interconnection and UNE prices.
- Failure to provide nondiscriminatory access to UNEs and combinations of UNEs.
- Failure to provide nondiscriminatory access to its OSSs.

## BellSouth Has Not Proved That Its Resale Offer Complies With The Act

- BellSouth has submitted no data by which the Commission could find its resale rates compliant.
- Further, its methodology and resulting 14.8% wholesale discount violates the Act.
- The refusal to offer contract service arrangements at a wholesale discount for resale violates the Act.
- The limitations on resale of CSAs violate the Act.

# The Wholesale Discount Does Not Comply With The Act

- BellSouth submitted no data, but relied solely on the SCPSC.
- The SCPSC order does not establish compliance
  - Endorses an "actually avoided" methodology
  - Adjusts rate from 13.2% to 14.8%
  - Provides no explanation for adjustments, and adjustments conflict with Commission's interpretation
- The 14.8% discount precludes effective resale entry.
  - Lowest in region
  - FCC regional proxy is 19.2%
  - Additional non-cost based "new install charges on CLEC migration orders.

# The Limitations on Resale of CSAs Do Not Comply With The Act

- The SGAT provides no wholesale discount. SGAT XIV.B.1.
- The contract terms are available only to the contracted customers on the same rates, terms and conditions.
- CLECs are prohibited from aggregating customers to achieve volume or revenue triggers to meet contract requirements and obtain discounts.

# BellSouth Is Increasingly Using CSAs to Tie Up Customers in South Carolina

- BellSouth's use of CSAs has increased dramatically.
  - 41 in 1995.
  - 66 in 1996.
  - 141 through 9/30/97.
- CSAs in South Carolina account for almost \$300 million in minimum revenue committments.
- CSAs have significant termination penalties.
  - E.g., \$2 million penalty if 3-year contract is terminated in first year.
     \$1 million penalty in second year.